

EXHIBIT G

The Honorable Judge Marsha Pechman



**UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

TRAVIS MICKELSON, DANIELLE H.
MICKELSON, and the marital community
thereof,

Plaintiffs,

v.

CHASE HOME FINANCE, LLC, an unknown
entity; JPMORGAN CHASE BANK, N.A., a
foreign corporation; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC., a foreign corporation; NORTHWEST
TRUSTEE SERVICES, INC., a domestic
corporation; JOHN DOES, unknown entities;
MORTGAGEIT, INC., a foreign corporation;
GMAC MORTGAGE CORPORATION, a
foreign corporation; CHICAGO TITLE, an
unknown corporation; ROUTH CRABTREE
OLSEN, P.S., a domestic Personal Services
Corporation; and FEDERAL HOME LOAN
MORTGAGE CORPORATION, a corporation,

Defendants.

No. C11-01445 MJP

**DEFENDANT NWTS' SECOND
AMENDED AND SUPPLEMENTAL
RESPONSES TO PLAINTIFFS' FIRST
SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION**

COMES NOW, Defendant Northwest Trustee Services, Inc. ("NWTS") and amends and supplements its previous responses to Plaintiffs Travis and Danielle Mickelson's ("Plaintiffs") First Set of Interrogatories and Requests for Production on Defendant NWTS ("Requests") as set forth in (1) Defendant NWTS' Responses to Plaintiff's First Set of Interrogatories and Requests for Production ("First Responses") and (2) the letter dated March 14, 2012, which amended and supplemented NWTS' First Responses ("March 2012 Letter").

DEFENDANT NWTS' RESPONSES TO
PLAINTIFFS' INTERROGATORIES AND
RFPS.1 of 11 C11-01445 MJP

ORIGINAL

ROUTH
CRABTREE
OLSEN, P.S.

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1 **INTERROGATORY NO. 6:** Identify the individual or entity you contend to be the Beneficiary
2 at the time of the trustee's sale of Plaintiffs' home and state further how the Beneficiary acquired
3 such status.

4 ANSWER: NWTS incorporates by reference and as if fully set forth herein the previous
5 response to Interrogatory No. 6 as set forth in the First Responses and the March 2012 Letter.
6

7 **INTERROGATORY NO. 7:** Identify and describe the financial transaction that took place
8 upon the trustee's sale in this matter, including:

- 9 a. The identity of the person employee who approved the transaction.
10 b. What funds flows among which entities and for what purpose.
11 c. Breakdown of fees and costs paid by Freddie Mac.
12 d. The total number of bids received and the basis for the acceptance of Freddie Mac's
13 offer.

14 ANSWER: NWTS incorporates by reference all previous objections to this
15 Interrogatory. Without waiving any previous objection, Defendant NWTS amends its response to
16 subparts (b),(c), and (d) set forth in the March 2012 Letter as follows:

17 As to subpart (b), NWTS objects to subpart (b) on the basis that it is vague, ambiguous,
18 and NWTS is unable to ascertain what information is being requested.

19 As to subpart (c), Freddie Mac paid no fees or costs to NWTS.
20

21 As to subpart (d), NWTS received only 1 bid. Chase Home Finance LLC submitted the
22 high bid at sale. By direction from Chase Home Finance LLC and course of dealing,
23 NWTS is directed to and did issue the Trustee's Deed to the benefit of Federal Home
24 Loan Mortgage Corporation.
25
26

1 **ATTORNEY CERTIFICATION**

2 The undersigned, as attorney for Defendant Northwest Trustee Services, Inc. certifies to
 3 the best of her knowledge, information and belief, formed after a reasonable inquiry that the
 4 responses and objections are: (1) consistent with the Civil Rules and warranted by existing law
 5 or a good faith argument for the extension, modification or reversal of existing law; (2) not
 6 interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless
 7 increase in the cost of litigation; and (3) not unreasonable or unduly burdensome or expensive,
 8 given the needs of the case, the discovery already had in the case, the amount in controversy and
 9 the importance of the issues at stake in the litigation.

10
 11 DATED this 26th day of April, 2012.

12 **ROUTH CRABTREE OLSEN, P.S.**

13 

14 Heidi E. Buck, WSBA No. 41769
 15 Of Attorneys for Defendants Northwest
 16 Trustee Services, Inc. and Routh Crabtree
 17 Olsen, P.S.